

EXHIBIT A

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I. Production or Identification of Specific Hyperlinked Documents from Policy Documents

1. Plaintiffs will be permitted to make one request per week of no more than 100 hyperlinked policies or related operational guidelines that have not previously been produced. Plaintiffs will identify these policies or related operational guidelines by Bates stamp of the source, including pin cite, and title or other indication of the policy or related operational guideline requested.

2. Defendants shall respond to Plaintiffs' weekly requests within five (5) days and provide all versions of the requested policies and/or related operational guidelines to Plaintiffs.

3. If Defendants are unable to satisfy or fulfill Plaintiffs' request(s), Defendants must meet-and-confer within 3 days of Plaintiffs' request. If Plaintiffs are unsatisfied by the Defendants' explanation for why such additional documentation cannot be produced, the meet-and-confer will qualify as the Parties' final meet-and-confer for the purposes of PTO 8.

II. Provision of Information Regarding Hyperlinks in Specific Policy Documents

1. By March 31, 2025, Defendants shall produce a metadata overlay providing corrected text and other related metadata for all documents included in their January 10 and 31, 2025 policy productions. Said corrected metadata shall include hyperlinks and family relationships (parent and child), so that Plaintiffs have relevant information regarding where each policy or related operational guideline links.

2. By April 15, 2025, Defendants shall produce a metadata overlay providing corrected text and other related metadata for the 239 remaining policies they identified on December 13, 2024. Said corrected metadata shall include hyperlinks and family relationships, so that Plaintiffs have relevant information regarding where each policy or related operational guideline links.

III. Inspection of Uber's Policy Systems

1. The inspection will occur on a date convenient for the parties and the Special Master prior to April 2, 2025.

2. Plaintiffs' counsel and consulting experts shall be permitted to conduct or observe the

1 inspection virtually.

2 3. The Parties will exchange the names, employers, and titles of all counsel and experts
3 that will participate in the inspection no fewer than three days prior to the inspection.

4 4. Plaintiffs shall provide a list of Uber produced policies that will be subject to
5 inspection no fewer than three days prior to the inspection.

6 5. During the inspection Plaintiffs shall be able to inspect any systems that house the
7 identified policies and related responsive documents (including hyperlinked documents and related
8 operational guidelines), as well as any systems or locations that house previous versions of those
9 policies and related responsive documents (including hyperlinked documents and related operational
10 guidelines).

11 6. Uber shall produce the individual or individuals most knowledgeable about Uber's
12 policies and systems that house or have housed those policies and related documents to facilitate the
13 inspection and provide the name of that person to Plaintiffs no fewer than three days prior to the
14 inspection. That person or persons shall be present during the inspection to answer questions or offer
15 guidance.

16 7. The inspection shall be recorded and Plaintiffs shall also be allowed to take
17 screenshots during the inspection.

18 8. Plaintiffs shall be permitted during the inspection to request access to and viewing of
19 any hyperlink included in any identified policy

20 9. If, during the inspection a hyperlink directs the user to any policy that was not
21 provided on Plaintiffs' original list Plaintiffs shall be permitted to access and view that document
22 and any hyperlinks located therein, subject to the reasonable opportunity for defense counsel to
23 object provided for in ECF 2545.